

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

STEVEN J. PALANGE

C.A NO.1:19-cv-00340-JJM-PAS

PLAINTIFF

v.

Michael Forte, Margarita Palange, Sandra Lanni, Richard E. Updegrove Jr.,
Tanya Gravel, Lois Iannone, Ronald Pagliarini, Peter Neronha, Jean
Maggiacomo, Courtney E. Hawkins, Tyler Technologies(TT), TT President and
CEO Lynn Moore, TT President Courts and Justice Division Rusty Smith,
Associate Director of Child Support Services Sharon Santilli, Deputy Director,
External Affairs Yvette Mendez, Paul Suttel Chief Justice Rhode Island
Supreme Court, Carol Malaga Family Court Stenographer.
DEFENDANTS.

Objection to Motion to Dismiss

I, Steven J. Palange hereby object to all defendants Motions to Dismiss this
Complaint, for violations of Constitutional abuse of due process, Federal and
State laws, and those same violations did to my minor daughter K.P.

The Plaintiff in the above-captioned matter Objects to Defendant's Motion to Dismiss based on the grounds that he has already presented overwhelming evidence that clearly shows Constitutional, Federal, and State violations of civil rights, laws, statutes, and rules.

The "threadbare" amended and supplemental complaint, as described by the defense, actually contains factual indisputable incidents of federal and constitutional violations that are capable of repetition yet evading review by a group of rogue government agents that profits more from the abuse of Constitutional Rights than the profit made from upholding the United States Constitution. Emails, letters, documents, and transcripts clearly illustrate that Rhode Island courts are operating as a racketeer influenced corporation. It has been two years, seven months, and thirty days since my daughter and I have had a physical relationship or contact. There has been no trial or hearing or agreements regarding and modification, vacation, or appeal of the Final Judgment of Divorce. I simply cannot honestly access the Rhode Island Courts.

My rights must be declared by this court. The defendants refrain and refuse to remedy the unlawful and obstructive conduct that violates my Constitutional

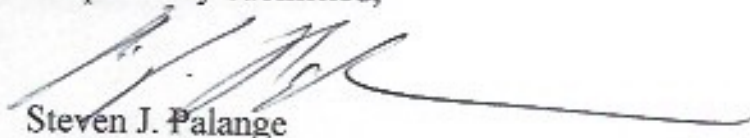
rights and the laws of the United States. Declaratory Remedy is necessary and without it, the unconstitutional and unlawful conduct will continue to repeat indefinitely at the great injury to me, the community, and K.P.

There is only one Rhode Island Court ruling or order this Court should recognize and not reject. It is the Final Judgment of Divorce by Judge Capineri on 12/18/2013

The Plaintiff, in this case, myself, Steven J. Palange, seeks only Declaratory Relief from these ongoing violations of my federal, state, and constitutional rights and those of my minor daughter K.P.. We are suffering irreparable harm and respectfully demand an evidentiary hearing. Testimony required.

This Motion is omnibus and objects to all pending Motions to Dismiss from all defendants in this matter.

Respectfully submitted,



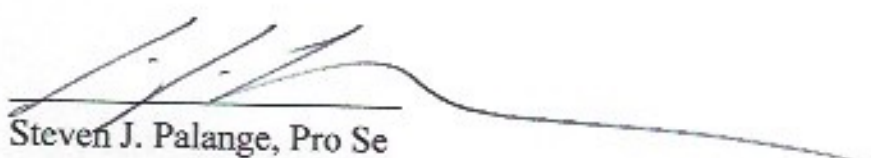
Steven J. Palange

By himself Pro Se,

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CERTIFICATION OF SERVICE

I hereby certify that on the 8th day of January 2021 I emailed a copy of this document to Justin J. Sullivan jjisullivan@riag.ri.gov and to all other lawyers via Rhode Island Federal District Court ECF.



Steven J. Palange, Pro Se